



May 27, 2025

Via ECF

Hon. Nina R. Morrison
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Jones v. NIKE Retail Services, Inc.
No. 22 Civ. 3343 (NRM) (ARL)**

Dear Judge Morrison:

Plaintiff writes together with Defendant to seek additional time to complete mediation with Stephen Sonnenberg of JAMS. We seek this additional time, as set forth below, because the Parties needed additional time to consider the impact of the New York State Legislature's amendment to Section 198 of the NYLL before mediating. *See* 2025 Sess. Law News of N.Y. Ch. 56 (S. 3006-C, Part U).

On May 9, Governor Hochul signed Chapter 56 of the Laws of 2025 (Part U) into law, which narrows the damages available to alleged manual workers paid on a biweekly basis. The amendment applies to pending and future claims. After receiving news of the legislative change, the Parties conferred to see if the mediation could still be productive. After speaking on multiple occasions and exchanging several emails, and in consultation with the Mediator, the Parties determined that a mediation on May 21, 2025, would not be productive. The Mediator and JAMS agreed to adjourn the mediation, without additional charges to the Parties, to July 16, the Mediator's next available date amenable to the Parties.

As a result, the Parties write to respectfully request an extension of time to mediate and complete discovery, if needed, after the mediation:

Deadline	Current Date	Proposed Date
Mediation	May 21, 2025	July 16, 2025
Mediation Status Report	May 28, 2025	July 23, 2025
Completion of All Discovery	June 20, 2025	August 22, 2025
Service of Class Certification Motion	June 30, 2025	September 8, 2025



Hon. Nina. R. Morrison, U.S.D.J.
Re: *Jones v. NIKE Retail Services, Inc.*
May 27, 2025
Page 2 of 2

Defendant's Opposition	35 days after service of Motion	Same
Plaintiff's Reply	14 days after service of Opposition	Same
First Step in Dispositive Motion Practice	August 4, 2025	October 10, 2025
Joint Pretrial Order	August 29, 2025	October 29, 2025
Final Conference Before Hon. Arlene R. Lindsay, U.S.M.J.	After Sept. 2, 2025, at a date and time to be determined by Judge Lindsay	After Nov. 3, 2025, at a date and time to be determined by Judge Lindsay

We thank the Court for its attention to this matter.

Respectfully submitted,



Garrett Kaske

cc: Counsel of Record (via ECF)